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 individually and on behalf of all others
 similarly situated*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

MARY JANE WHALEN, MONICA
 MEILOAICA, and CHASOM BROWN,
 individually and on behalf of all others
 similarly situated,

Plaintiffs,

v.

EPIQ SYSTEMS, INC., ANGEION GROUP
 LLC, JND LEGAL ADMINISTRATION,
 HUNTINGTON NATIONAL BANK,
 WESTERN ALLIANCE BANK, and DOES 1-
 20,

Defendants.

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Case No.: 3:25-cv-04522

**NOTICE OF PENDENCY OF OTHER
 ACTION OR PROCEEDING (L.R. 3-13)**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Civil Local Rule 3-13, Plaintiffs Mary Jane Whalen, Monica Meiloaica, and Chasom Brown (“Plaintiffs”), hereby notify the Court of the pendency of the following other actions involving substantially the similar subject matter and parties as this case.

- *Mary Jane Whalen v. Epiq Systems Inc., et al.* / Class Action Complaint, Case No. 1:25-cv-04499, currently pending in the United States District Court for the Southern District of New York (filed on May 29, 2025) (“NY *Whalen* Action”).¹ The Plaintiffs are Mary Jane Whalen, individually and on behalf of all others similarly situated. The Defendants are Epiq Systems, Inc., Angeion Group LLC, JND Legal Administration, Huntington National Bank, Western Alliance Bank, and DOES 1-20. The Defendants are identical to those named in this action filed by Plaintiffs. A copy of the operative complaint in this action is attached hereto as **Exhibit A**.
- *Roger Tejon v. Epiq Systems, Inc., et al.* / Class Action Complaint, Case No. 1:25-CV-22453, currently pending in the United States District Court for the Southern District of Florida (filed on May 29, 2025). The Plaintiff is Roger Tejon, individually and on behalf of all others similarly situated. The Defendants are identical to this action and the NY *Whalen* Action: Epiq Systems, Inc., Angeion Group LLC, JND Legal Administration, Huntington National Bank, Western Alliance Bank, and DOES 1-20. A copy of the operative complaint in this action is attached hereto as **Exhibit B**.
- *Baker et al. v. Angion Group LLC et al.*, Case No. 2:25-cv-02079-KBH. is a putative class action currently pending in the Eastern District of Pennsylvania (“*Baker* Action”). The *Baker* Action was filed on April 24, 2025 and an amended complaint was filed on June

¹ There is another action pending in this judicial district that is the subject of Plaintiffs’ Administrative Motion to Consider Whether Cases Should be Related, entitled *Nicole Rieger, et al. v. Epiq Systems Inc., et al.*, Case No. 3:25-cv-04793-TSH (filed on June 5, 2025), which asserts the same causes of action against the similar defendants .

13, 2025. The amended complaint in the *Baker* Action includes similar causes of action and is brought against Defendants Angeion Group LLC (“Angeion”), Epiq Systems, Inc. (“Epiq”), JND Legal Administration (“JND”), Tremendous LLC, Blackhawk Network Holdings, Inc., Digital Settlement Technologies LLC dba Digital Disbursement Payments, Huntington National Bank, Western Alliance Bank, and DOES 1-20. A copy of the operative complaint in this action is attached hereto as **Exhibit C**.

The actions involve essentially similar disputes and include similar facts. All cases also allege similar claims, i.e., breach of fiduciary duty, fraud, violation of the Sherman Act, RICO and RICO Conspiracy, among other similar claims and are putative class actions. The Defendants also overlap, as described above. The procedural posture of all of the actions is early. They have all been initiated in just the past few weeks, with service still being effectuated on Defendants.

Dated: July 1, 2025

By /s/ Mark C. Mao
Mark C. Mao

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